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Attorneys for Debtors and Reorganized Debtors

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

In re:

PG&E CORPORATION,

- and -

**PACIFIC GAS AND ELECTRIC
COMPANY,**

Debtors.

- ☐ Affects PG&E Corporation
☐ Affects Pacific Gas and Electric
Company
☒ Affects both Debtors

** All papers shall be filed in the Lead Case,
No. 19-30088 (DM).*

Case No. 19-30088 (DM)

Chapter 11

(Lead Case) (Jointly Administered)

**REQUEST FOR ENTRY OF ORDER BY
DEFAULT ON APPLICATION OF
DEBTORS PURSUANT TO 11 U.S.C. § 327(e)
AND FED. R. BANKR. P. 2014(a) AND 2016
AND THE COURT'S ORDER
AUTHORIZING THE DEBTORS TO
EMPLOY PROFESSIONALS USED IN THE
ORDINARY COURSE OF BUSINESS FOR
AUTHORITY TO RETAIN AND EMPLOY
CLARENCE DYER & COHEN LLP AS
SPECIAL COUNSEL FOR THE DEBTORS
EFFECTIVE AS OF THE PETITION DATE**

[Re: Docket No. 8679]

REQUEST FOR ENTRY OF ORDER BY DEFAULT

PG&E Corporation and Pacific Gas and Electric Company (the “**Utility**”), as debtors and reorganized debtors (each, a “**Debtor**,” and collectively, the “**Debtors**”) in the above-captioned chapter 11 cases (the “**Chapter 11 Cases**”) hereby request, pursuant to Rule 9014-1(b)(4) of the Bankruptcy Local Rules for the United States District Court for the Northern District of California, as made applicable to these Chapter 11 Cases by the *Second Amended Order Implementing Certain Notice and Case Management Procedures* entered on May 14, 2019 [Dkt No. 1996] (“**Case Management Order**”), that the Court enter an order by default on the *Application of Debtors Pursuant to 11 U.S.C. § 327(e) and Fed. R. Bankr. P. 2014(a) and 2016 and the Court’s Order Authorizing the Debtors to Employ Professionals Used in the Ordinary Course of Business for Authority to Retain and Employ Clarence Dyer & Cohen LLP as Special Counsel for the Debtors Effective as of the Petition Date* filed by the Debtors on August 5, 2020 [Dkt. No. 8679] (the “**Application**”).

RELIEF REQUESTED IN THE APPLICATION

The Application seeks entry of an order approving the retention of Clarence Dyer & Cohen LLP (“**CDC**”) as the Debtors’ special counsel, pursuant to section 327(e) of the Bankruptcy Code, to represent the Debtors in connection with the Special Matters¹ described therein, on the terms and conditions set forth in the Application and Dyer Declaration.

A proposed order (the “**Proposed Order**”) was attached as **Exhibit A** to the Application. The order being submitted is substantively identical to the Proposed Order attached to the Application, except that the reference to a hearing being held has been deleted.

NOTICE AND SERVICE

A Notice of Entry of Order Shortening Time and Notice of Hearing on Application of Debtors Pursuant to 11 U.S.C. § 327(e) and Fed. R. Bankr. P. 2014(a) and 2016 and the Court’s Order Authorizing the Debtors to Employ Professionals Used in the Ordinary Course of Business for

¹ Capitalized terms used but not otherwise defined herein shall have the meanings given to them in the Application.

1 *Authority to Retain and Employ Clarence Dyer & Cohen LLP as Special Counsel for the Debtors*
2 *Effective as of the Petition Date* was filed on August 6, 2020 [Dkt. No. 8699] (the “**Notice of**
3 **Hearing**”). The Application, the Notice of Hearing, and the supporting declarations of Kate Dyer
4 [Dkt. No. 8680] and Janet Loduca [Dkt. No. 8681] were served as described in the Certificate of
5 Service of Andrew G. Vignali, filed on August 11, 2020 [Dkt. No. 8743]. The Notice of Hearing and
6 the order shortening time [Dkt. No. 8695] were served as described in the Certificate of Service of
7 Andrew G. Vignali, filed on August 12, 2020 [Dkt. No. 8751]. The deadline to file responses or
8 oppositions to the Application has passed, and no responses or oppositions have been filed with the
9 Court or received by counsel for the Debtors.

10 **DECLARATION OF NO OPPOSITION RECEIVED**

11 The undersigned hereby declares, pursuant to 28 U.S.C. § 1746, under penalty of perjury, that:

- 12 1. I am an attorney with the firm of Keller Benvenuti Kim LLP, co-counsel for the
13 Debtors.
14 2. I have reviewed the Court’s docket in the Chapter 11 Cases and have determined that
15 no response or opposition has been filed with respect to the Application.
16 3. This declaration was executed in Sunnyvale, California.

17 WHEREFORE, the Debtors hereby request entry of the Proposed Order substantially in the
18 form attached to the Application, granting the Application as set forth therein.

19
20 Dated: August 19, 2020

WEIL, GOTSHAL & MANGES LLP
KELLER BENVENUTTI KIM LLP

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22 /s/ Thomas B. Rupp
Thomas B. Rupp

23 *Attorneys for Debtors and Debtors in Possession*
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